

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

SEP 30 2015

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA §

VS. §

JASON RYAN HALL §
ANISSA LAVON BURDETT §
HOWARD PRICE JOHNSON §

CRIMINAL NO. H-15-530

(UNDER SEAL)

INDICTMENT

INTRODUCTION

Sealed
Public and unofficial staff access
to this instrument are
prohibited by court order.

At all times material to this indictment:

1. Jason Ryan Hall ("HALL") was an individual residing in Houston, Texas who purported to be in the used car business, among other alleged businesses, and who operated under the names "EZ Auto Group," "1st Choice Motors," "Masejase Group," "Masejase Inc.," and "NOBS."

2. Anissa Lavon Burdett ("BURDETT") was an individual residing in Ohio and Texas who operated under the names "Choiz Wireless LLC," and "Burdett Ventures LLC."

3. Howard Price Johnson ("JOHNSON") was an individual residing in Utah who operated under the name "Halcyon Ventures LLC."

4. C.L. was an individual identified by those initials residing in Utah.

5. K.B. was an individual identified by those initials residing in Utah.

COUNT ONE
(Conspiracy to commit Bank Fraud, 18 U.S.C. § 1349)

A. INTRODUCTION

6. The Grand Jury adopts, realleges, and incorporates herein the Introduction section of the Indictment as if set out fully herein.

B. THE SCHEME AND ARTIFICE

7. From on or about April 29, 2011, and continuing up to and including the date of the Indictment, in the Southern District of Texas and elsewhere, the defendants,

**JASON RYAN HALL,
ANISSA LAVON BURDETT, and
HOWARD PRICE JOHNSON,**

did knowingly combine, conspire, confederate and agree with each other and others known and unknown to the Grand Jury, to commit the following offense against the United States: to execute a scheme or artifice to defraud a financial institution and to obtain funds under the custody and control of the financial institution by means of false pretenses in violation of 18 U.S.C. § 1344 (bank fraud).

C. MANNER AND MEANS OF THE CONSPIRACY

It was part of the conspiracy that:

8. HALL held himself out as a used car dealer who sold luxury vehicles through his alleged dealerships EZ Auto Group and 1st Choice Motors.

9. HALL's dealerships, however, existed only as websites and had no

physical existence and made no actual auto sales.

10. Acting as “straw buyers,” BURDETT, JOHNSON, C.L., and K.B. applied to lenders for auto loans in order to purchase vehicles from HALL’s supposed dealerships.

11. In their auto loan applications, BURDETT, JOHNSON, C.L. and K.B. made multiple misrepresentations to prospective lenders, including the vehicle to be purchased, the vehicle to be traded-in, the dealership, their employment, and their level of income.

12. BURDETT, JOHNSON, and C.L. also failed to disclose in auto loan applications that they had recently applied for and obtained auto loans from other lenders, sometimes to purchase the exact same vehicle for which they were again seeking financing.

13. Once the auto loan funds had been deposited into HALL’s bank accounts, HALL kicked-back to BURDETT and JOHNSON a portion of the loan funds.

14. HALL never delivered vehicles to BURDETT, JOHNSON, C.L., or K.B. and never delivered vehicle titles to the lenders.

15. BURDETT, JOHNSON, and C.L. failed to timely pay-off their auto loans, and the loans went into default.

D. ACTS IN FURTHERANCE OF THE CONSPIRACY

16. In furtherance of the conspiracy, and to effect the objects of the

conspiracy, the following acts, among others, were committed in the Southern District of Texas and elsewhere.

HALL Bank Account Openings

- a. On or about April 29, 2011, HALL opened a checking account ending in 1882 at JP Morgan Chase Bank in the name of Jason Ryan Hall dba Masejase Group dba EZ Auto Group.
- b. On or about July 15, 2011, HALL opened a checking account ending in 1635 at JP Morgan Chase Bank in the name of Jason Ryan Hall dba 1st Choice Motors.
- c. On or about July 19, 2011, HALL opened a checking account ending in 1833 at JP Morgan Chase Bank in the name of Jason Ryan Hall dba NOBS.
- d. On or about October 26, 2011, HALL opened a checking account ending in 5402 at Wells Fargo Bank in the name of Jason R Hall dba 1st Choice Motors.
- e. On or about November 7, 2011, HALL opened a checking account ending in 5988 at Citibank in the name of Jason Hall dba 1st Choice Motors.

K.B. Auto Loan Application

- f. On or about June 1, 2011, K.B. applied for a loan from Utah First Credit Union for approximately \$30,000 purportedly to purchase a 2009 Mercedes with VIN Number WDBUF72X99B366946.

C.L. Auto Loan Applications

- g. On or about July 14, 2011, C.L. applied for a loan from Wells Fargo Bank for approximately \$30,196 purportedly to purchase a 2009 Mercedes with VIN Number WDBUF90X49B356677.
- h. On or about July 26, 2011, C.L. applied for a loan from GTE Federal Credit Union for approximately \$25,000 purportedly to purchase a 2009 Lexus with VIN Number JTHBK262295090614.

- i. On or about July 28, 2011, C.L. applied for a loan from Langley Federal Credit Union for approximately \$40,000 purportedly to purchase a 2010 Mercedes with VIN Number WDDHF5GB5AA086168.
- j. On or about August 2, 2011, C.L. applied for a loan from Alabama State Employees Credit Union for approximately \$40,000 purportedly to purchase a 2009 Lexus with VIN Number JTHBK262295090614.
- k. On or about August 19, 2011, C.L. applied for a loan from Stanford Federal Credit Union for approximately \$40,000 purportedly to purchase a 2008 Mercedes with VIN Number WDBUF56X58B286508.

BURDETT Auto Loan Applications

- l. On or about September 21, 2011, BURDETT applied for a loan from CME Credit Union for approximately \$60,350 purportedly to purchase a 2010 Mercedes with VIN Number WDDDJ7CB6AA180129.
- m. On or about September 21, 2011, BURDETT applied for a loan from Kemba Financial Credit Union for approximately \$60,295 purportedly to purchase a 2010 Mercedes with VIN Number WDDDJ7CB6AA160129.
- n. On or about September 26, 2011, BURDETT applied for a loan from Langley Federal Credit Union for approximately \$49,769 purportedly to purchase a 2010 Mercedes with VIN Number WDDDJ7CB6AA160129.
- o. On or about September 26, 2011, BURDETT applied for a loan from JP Morgan Chase for approximately \$55,000 purportedly to purchase a 2010 Mercedes with VIN Number WDDDJ7CB6AA160129.
- p. On or about September 27, 2011, BURDETT applied for a loan from Credit Union of Ohio for approximately \$50,100 purportedly to purchase a 2010 Mercedes with VIN Number WDDDJ7CB6AA160129.
- q. On or about October 4, 2011, BURDETT applied for a loan from Stanford Federal Credit Union for approximately \$55,000 purportedly to purchase a 2010 Mercedes with VIN Number WDDDJ7CB6AA160129.

JOHNSON Auto Loan Applications

- r. On or about October 25, 2011, JOHNSON applied for a loan from Zions Bank for approximately \$35,000 purportedly to purchase a 2007 Mercedes with VIN Number 1J4FA24179L772779.
- s. On or about October 25, 2011, JOHNSON applied for a loan from Jordan Credit Union for approximately \$32,000 purportedly to purchase a 2007 Mercedes with VIN Number WDDNG71X27A111178.
- t. On or about October 26, 2011, JOHNSON applied for a loan from Cyprus Federal Credit Union for approximately \$45,000 purportedly to purchase a 2009 Mercedes with VIN Number WDDNG86X39A282880.
- u. On or about November 3, 2011, JOHNSON applied for a loan from Mountain America Federal Credit Union for approximately \$48,031.15 purportedly to purchase a 2007 Mercedes with VIN Number WDDNG71X27A111178.

COUNTS TWO - FOUR **(Bank Fraud, 18 U.S.C. §§ 1344 and 2)**

A. INTRODUCTION

17. The Grand Jury adopts, realleges, and incorporates herein the Introduction section of the Indictment as if set out fully herein.

B. THE SCHEME AND ARTIFICE

18. From on or about April 29, 2011, and continuing up to and including the date of the Indictment, the defendants,

**JASON RYAN HALL,
ANISSA LAVON BURDETT, and
HOWARD PRICE JOHNSON,**

in the specific counts listed below, aided and abetted by each other and others known

and unknown to the grand jury, did knowingly execute and attempt to execute a scheme and artifice to defraud a financial institution, and to obtain moneys, funds, and property owned by and under the custody and control of a financial institution by means of false and fraudulent pretenses, representations, and promises.

C. MANNER AND MEANS OF THE SCHEME AND ARTIFICE

19. The Grand Jury adopts, realleges, and incorporates herein the manner and means allegations in Paragraphs Eight through Fifteen of Count One as if set out fully herein.

D. EXECUTION OF THE SCHEME AND ARTIFICE

20. On or about the dates listed below, in the Southern District of Texas and elsewhere, the defendants listed below, for the purpose of executing the aforementioned scheme and artifice to defraud, did knowingly cause the auto loan applications listed below to be submitted to the following financial institutions:

Count	Loan App. Date	Defendants	Financial Institution	Vehicle	Straw Buyer	Loan amt.
2	7/14/11	JASON RYAN HALL and HOWARD PRICE JOHNSON	Wells Fargo	2009 Mercedes VIN# WDBUF90 X49B356677	C.L.	\$30,196.00
3	9/26/11	JASON RYAN HALL and ANNISA LAVON BURDETT	JP Morgan Chase	2010 Mercedes VIN# WDDDJ7 CB6AA160129	BURDETT	\$55,000.00
4	10/25/11	JASON RYAN HALL and HOWARD PRICE JOHNSON	Zions Bank	2007 Mercedes VIN# 1J4FA241 79L772779	JOHNSON	\$35,000.00

In violation of Title 18, United States Code, Sections 1344 and 2.

COUNTS FIVE - TEN
(Money Laundering, 18 U.S.C. §§ 1957 and 2)

21. The Grand Jury adopts, realleges, and incorporates herein the Introduction Section of the Indictment and the Manner and Means Section of Count One.

22. On or about the dates set forth below, in the Southern District of Texas and elsewhere, the defendants,

**JASON RYAN HALL,
ANISSA LAVON BURDETT, and
HOWARD PRICE JOHNSON,**

in the specific counts listed below, aided and abetted by each other and others known and unknown to the grand jury, did knowingly engage and attempt to engage in the following monetary transactions by, through or to a financial institution, affecting interstate commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, that is, bank fraud, a violation of Title 18, United States Code, Section 1344.

Count	Date	Defendants	Monetary Transaction
5	7/20/11	JASON RYAN HALL and HOWARD PRICE JOHNSON	Transfer of \$21,296.00 from JP Morgan Chase account ending 1635 in the name of Jason Ryan Hall d/b/a 1 st Choice Motors to First National Bank account ending 0101 in the name of Halcyon Ventures LLC
6	8/5/11	JASON RYAN HALL and HOWARD PRICE JOHNSON	Transfer of \$19,034.61 from JP Morgan Chase account ending 1833 in the name of Jason Ryan Hall d/b/a NOBS to First National Bank account ending 0101 in the name of Halcyon Ventures LLC

7	9/29/11	JASON RYAN HALL and ANISSA LAVON BURDETT	Transfer of \$30,000.00 from JP Morgan Chase account ending 1882 in the name of Jason Ryan Hall d/b/a Masejase Group d/b/a EZ Auto Group to JP Morgan Chase Bank account ending 6242 in the name of Choiz Wireless LLC
8	9/30/11	JASON RYAN HALL and ANISSA LAVON BURDETT	Transfer of \$28,825.00 from JP Morgan Chase account ending 1882 in the name of Jason Ryan Hall d/b/a Masejase Group d/b/a EZ Auto Group to Huntington National Bank account ending 3449 in the name of Burdett Ventures LLC
9	10/3/11	JASON RYAN HALL and ANISSA LAVON BURDETT	Transfer of \$42,500.00 from JP Morgan Chase account ending 1882 in the name of Jason Ryan Hall d/b/a Masejase Group d/b/a EZ Auto Group to Huntington National Bank account ending 9951 in the name of Anissa Burdett
10	11/9/11	JASON RYAN HALL and HOWARD PRICE JOHNSON	Transfer of \$21,000.00 from Wells Fargo Bank account ending 5402 in the name of Jason R Hall dba 1 st Choice Motors to First National Bank account ending 0101 in the name of Halcyon Ventures LLC

In violation of Title 18, United States Code, Section 1957 and 2.

NOTICE OF FORFEITURE
28 U.S.C. § 2461(c); 18 U.S.C. § 981(a)(1)(C)

23. Pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C), the United States gives notice to defendants,

**JASON RYAN HALL,
ANISSA LAVON BURDETT, and
HOWARD PRICE JOHNSON,**

that upon conviction of a violation of Title 18, United States Code, Section 1344, all property, real or personal, which constitutes or is derived from proceeds traceable to such offense, is subject to forfeiture.

NOTICE OF FORFEITURE
18 U.S.C. § 982(a)(1)

24. Pursuant to Title 18, United States Code, Section 982(a)(1), the United States gives notice to defendants,

**JASON RYAN HALL,
ANISSA LAVON BURDETT, and
HOWARD PRICE JOHNSON,**

that upon conviction of a violation of Title 18, United States Code, Section 1957, all property, real or personal, involved in such money laundering offense or traceable to such property, is subject to forfeiture.

Money Judgment

25. Defendants are notified that upon conviction, a money judgment may be imposed equal to the total value of the property subject to forfeiture, for which the defendants may be jointly and severally liable. That amount is estimated to be, but is not limited to, approximately \$530,741 in United States dollars.

Substitute Assets

26. Defendants are notified that in the event that property subject to forfeiture, as a result of any act or omission of defendants,

(A) cannot be located upon the exercise of due diligence;

(B) has been transferred or sold to, or deposited with, a third party;

(C) has been placed beyond the jurisdiction of the court;

(D) has been substantially diminished in value; or

(E) has been commingled with other property that cannot be divided without difficulty,

the United States will seek to forfeit any other property of the defendants up to the total value of the property subject to forfeiture pursuant to Title 21, United States Code, Section 853(p), incorporated by reference in Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 982(b)(1).

A TRUE BILL:

Original Signature on File

FOREPERSON OF ~~THE~~ THE GRAND JURY

KENNETH MAGIDSON
UNITED STATES ATTORNEY

By:

A handwritten signature in black ink, appearing to read 'Robert S. Johnson', written over a horizontal line.

Robert S. Johnson
Assistant United States Attorney